

**Department of Transportation  
National Highway Traffic Safety Administration  
Information Collection Request Supporting Statements: Part A  
Consolidated Labeling Requirements for Motor Vehicles (except the VIN)  
[49 CFR PARTS 571.105, 135, 205, 208, 209, 303, 304, 307, and 308]  
OMB Control Number 2127-0512**

**Abstract:<sup>1</sup>**

This information collection request (ICR) is for mandatory disclosure requirements for manufacturers of motor vehicles. The National Highway Traffic Safety Administration (NHTSA) establishes Federal Motor Vehicle Safety Standards (FMVSSs) that set performance requirements for motor vehicles and items of motor vehicle equipment. Some of these FMVSS require the manufacturer to disclose certain information to consumers. This ICR is a request for reinstatement with modification of a collection of information pertaining to the requirement to provide certain information to consumers on labels attached to new motor vehicles and items of motor vehicle equipment. These labeling requirements are in FMVSS No. 105, "Hydraulic and electric brake systems," FMVSS No. 135, "Light vehicle brake systems," FMVSS No. 205, "Glazing materials," FMVSS No. 208, "Occupant Crash Protection," FMVSS No. 209, "Seat belt assemblies," FMVSS No. 303, "Fuel system integrity of compressed natural gas vehicles," FMVSS No. 304, "Compressed natural gas fuel container integrity," FMVSS No. 307, "Fuel system integrity of hydrogen vehicles," and FMVSS No. 308, "Compressed hydrogen storage system integrity." Manufacturers must comply with these requirements on an as-needed basis (i.e., whenever they manufacture a vehicle or item of motor vehicle equipment that is subject to the requirements). The purpose of the required disclosures is to provide important safety information to consumers. Since NHTSA last requested approval for this collection, the estimated burden has increased by 27,252 hours and cost burden has increased by \$25,124,523. The estimated cost to the Federal Government to check that this information is correctly provided is \$7,808. These hours and costs account for a change in the estimated number of vehicles and vehicle models that will be produced each year, an increase in the estimated hourly labor costs, and the addition of the cost added to motor vehicle equipment to make certain information available. NHTSA is also requesting a modification of this collection to include three existing label requirements that were not previously included in this ICR and two recently established labeling requirements. The label requirements added to this ICR are for requirements contained in 49 CFR Parts 571.208, 303, 304, 307, and 308.

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<sup>1</sup> The Abstract must include the following information: (1) whether responding to the collection is mandatory, voluntary, or required to obtain or retain a benefit; (2) a description of the entities who must respond; (3) whether the collection is reporting (indicate if a survey), recordkeeping, and/or disclosure; (4) the frequency of the collection (e.g., bi-annual, annual, monthly, weekly, as needed); (5) a description of the information that would be reported, maintained in records, or disclosed; (6) a description of who would receive the information; (7) if the information collection involves approval by an institutional review board, include a statement to that effect; (8) the purpose of the collection; and (9) if a revision, a description of the revision and the change in burden.

## A. JUSTIFICATION

This document requests reinstatement with modification of the previous version of the Supporting Statement for Consolidated Labeling Requirements for Motor Vehicles (Except the VIN) (OMB Control Number 2127-0512).

**1. Explain the circumstances that made the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

The National Traffic and Motor Vehicle Act authorizes the Secretary of Transportation (NHTSA by delegation), at 49 U.S.C. 30111, to FMVSS that set performance standards for motor vehicles and items of motor vehicle equipment. Further, the Secretary (NHTSA by delegation) is authorized, at 49 U.S.C. 30117, to require manufacturers to provide information to first purchasers of motor vehicles or items of motor vehicle equipment related to performance and safety in printed materials that are attached to or accompany the motor vehicle or item of motor vehicle equipment.

NHTSA has exercised this authority to require manufacturers to provide certain specified safety information to be readily available to consumers and purchasers of motor vehicles and items of motor vehicle equipment. This information is most often provided on labels attached to the vehicle or attached to or printed on accompanying the equipment. This information collection request only covers requirements or requests to provide information that is not provided verbatim in the regulation or standard. A summary of these requirements is provided below.

### FMVSS No. 105, “Hydraulic and electric brake systems”

This standard applies to multi-purpose passenger vehicles, trucks, and buses with a GVWR greater than 3,500 kilograms (7,716 pounds) that are equipped with hydraulic or electric brake systems. FMVSS No. 105 requires, under Section 5.4.3, that hydraulic brake system manufacturers shall apply a brake fluid warning statement to clean the filler cap before removing and to only fill the reservoir from a sealed container of the specified brake fluid to each covered vehicle.

### FMVSS No. 135, “Light vehicle brake systems”

This standard applies to passenger cars and to multi-purpose passenger vehicles, trucks, and buses with a gross vehicle weight rating (GVWR) of 3,500 kilograms (7,716 pounds) or less. FMVSS No. 135 requires, under Section 5.4.3, that light vehicle brake system manufacturers shall apply a brake fluid warning including a statement to clean the filler cap before removing and to only fill the reservoir from a sealed container of the specified brake fluid to each covered vehicle.

## FMVSS No. 205, “Glazing materials”

FMVSS No. 205 specifies requirements for glazing materials for use in passenger cars, multipurpose passenger vehicles, trucks, buses, motorcycles, slide-in campers, pickup covers designed to carry persons while in motion and low speed vehicles, and to glazing materials for use in those vehicles. The standard establishes a glazing manufacturer’s identification system and specifies certification and marking for each piece of glazing material. Certification for the items listed comes in the form of a label, tag or marking on the outside of the motor vehicle equipment and is permanently affixed and visible for the life of the motor vehicle equipment.

The purpose of this standard is to aid in reducing injuries resulting from impact to glazing surfaces, and to ensure a necessary degree of transparency for driver visibility. Both glass and plastics are considered to be glazing materials, which provide safety and minimize the possibility of occupants being thrown through the vehicle window in the event of a crash.

[NOTE: FMVSS No. 205 requires cleaning instructions for glazing materials in every Owner's Manual. These provisions are contained under the OMB Clearance Number 2127-0541. This justification for assigning DOT Code Numbers to glazing manufacturers is solely for certification of compliance with this standard.]

The label shall comply with the requirements of S6 of FMVSS No. 205. ANSI/SAE Z26.1–1996, “American National Standard for Safety Glazing Materials for Glazing Motor Vehicles and Motor Vehicle Equipment Operating on Land Highways-Safety Standard,” is incorporated by reference into FMVSS No. 205. ANSI Z26.1-1996, S7, contains additional requirements regarding the marking of motor vehicle glazing material.

In general, the following information is required:

- Manufacturer's distinctive trademark
- Manufacturer's "DOT" code number
- Model of glazing (alpha-numerical designation)
- Type of glazing (there are currently 13 items of glazing ranging from plastic windows to bullet resistant windshields).

In addition to these requirements that apply to all glazing, certain specialty items such as standee windows in buses, roof openings and interior partitions made of plastic require that the manufacturer affix a removable label to each item. The label specifies cleaning instructions that will minimize the loss of transparency. Other information may be provided by the manufacturer but is not required.

#### FMVSS No. 208, “Occupant Crash Protection”

This standard specifies requirements for both active and passive occupant crash protection systems for passenger cars, multipurpose passenger vehicles, trucks, and small buses. At the manufacturer’s option, a permanent label must be affixed to either side of the sun visor at each front outboard seating position that is equipped with an inflatable restraint. The label shall conform in content to the label shown in Figure 11 of FMVSS No. 208 and shall comply with the requirements of S4.5.1(b)(3)(i) through S4.5.1(b)(3)(iv) of that standard. Additionally, each vehicle that is equipped with an inflatable restraint for the passenger position shall have a label attached to a location on the dashboard or steering wheel hub that is clearly visible from all front seating positions. This label shall conform in content to the label shown in Figure 7 of FMVSS No. 208 and shall comply with the requirements of S4.5.1(e)(1)(i) through S4.5.1(e)(1)(iii) of FMVSS No. 208. This label need not be permanently affixed to the vehicle.

#### FMVSS No. 209, “Seat belt assemblies”

S4.1(j) of FMVSS No. 209 requires safety belt manufacturers to label seat belt assemblies with the year of manufacture, the model, and the name or trademark of the manufacturer. Additionally, replacement safety belts that are for specific models of motor vehicles must have labels or accompanying instruction sheets to specify the applicable vehicle models and seating positions (S4.1(k)).

#### FMVSS No. 303, “Fuel system integrity of compressed natural gas vehicles.”

This standard specifies requirements for the integrity of motor vehicle fuel systems using compressed natural gas (CNG), including the CNG fuel systems of bi-fuel, dedicated, and dual fuel CNG vehicles. CNG manufacturers are required to label each CNG vehicle to have a permanent label which lists the CNG service pressure and a statement directing vehicle users/operators to instructions for inspection and service life of the fuel container.

#### FMVSS No. 304, “Compressed natural gas fuel container integrity.”

This standard specifies requirements for the integrity of CNG, motor vehicle fuel containers. CNG manufacturers are required to label each CNG fuel container is to have a permanent label containing information relating to the proper use, installation, and maintenance of the CNG container.

#### FMVSS No. 307, “Fuel system integrity of hydrogen vehicles.”

The purpose of this standard is to reduce deaths and injuries occurring from fires that result from fuel leakage while the vehicle is in service and after motor vehicle crashes. Manufacturers are required to label hydrogen vehicles with the refueling service pressure to allow a person to select the correct hydrogen pressure when refueling the vehicle. Vehicle operators are also notified where to find information relating to inspection and service life of the hydrogen container.

### FMVSS No. 308, “Compressed hydrogen storage system integrity.”

The purpose of this standard is to reduce deaths and injuries occurring from container burst and from fires that result from fuel leakage from the container. Manufacturers are required to label compressed hydrogen storage systems (CHSSs) with the container’s manufacturer contact information, container serial number, manufacturing date, nominal working pressure (NWP), fuel type, end-of-life date, and inspection information for the container. This information aides vehicle operators and maintenance entities in the safe usage of the CHSS during its usable lifetime. Some of the information is also used by NHTSA for compliance testing.

This information is used by hydrogen vehicle manufacturers, fuel system integrators, fuel system inspectors, and vehicle operators. Vehicle manufactures use this information to confirm that the containers installed during vehicle manufacture are correct and compatible with the vehicle design. Similarly, fuel system integrators may use the information to ensure containers are compatible with other fuel system components when installing and/or converting a fuel system to hydrogen. Fuel system safety inspectors use the information to properly inspect the container, as required by the label. Vehicle operators may refer to the label when fueling the vehicle to ensure the fueling station will provide the correct pressure to the container. The information on the label can also be used to contact the container manufacture in the event there is a question or concern regarding the container.

### **2. Indicate how, by whom and for what purpose the information is to be used. Except for a new collection, indicate actual use the agency has made of the information received from the current collection.**

### FMVSS No. 105, “Hydraulic and electric brake systems”

These standards establish requirements for labeling to be placed on or near the master cylinder reservoir in such a manner that the label conforms to this standard and is permanently affixed, engraved, or embossed. The statement must read as follows: "WARNING, clean filler cap before removing, use only \_\_\_fluid from a sealed container." This information is used by owners or operators and service people to select the proper brake fluids and to take the necessary caution needed in handling the caps of fluid reservoirs.

### FMVSS No. 135, “Light vehicle brake systems”

The purpose of these standards is to ensure safe braking performance under normal and emergency conditions. This applies to passenger cars, multipurpose vehicles, trucks, and buses with hydraulic service brake systems. Each manufacturer must identify the recommended fluids to be used in each vehicle it manufactures. If the labeling requirements are not mandatory, the likelihood of the addition of improper fluids into a brake system would increase as well as the possibility of dirt contamination.

## FMVSS No. 205, "Glazing materials"

In accordance with FMVSS No. 205, before a manufacturer can produce glazing materials for automobiles, a letter must be written to NHTSA showing an interest in marketing their materials in the United States. Each piece of glass, plastic or combined glass-plastic glazing material installed in a motor vehicle or equipment must be identified by a series of markings. This mark is referred to as the "DOT Code Number." This code number identifies the original glass or plastic manufacturer. Each manufacturer has only one code number for each specific glazing material, which is assigned by NHTSA and is reported once and becomes valid indefinitely as long as the requesting manufacturer remains in business. The Office of Vehicle Safety Compliance will receive, review, and assign DOT Code Numbers. The information collection process is to identify the manufacturer's materials and to identify their product in crashes involving defects. The technical field of automotive glazing has become increasingly specialized over the years and many manufacturers produce more than one or two varieties. If this reporting requirement were discontinued, the ability to determine identification of glazing manufacturer would be placed in jeopardy.

After obtaining an identification number, a manufacturer must mark each piece of automotive glazing using a fixed format for labeling specified in FMVSS No. 205. Glazing not marked properly would not conform to FMVSS No. 205 and therefore could not be offered for sale in motor vehicles in the United States. Each prime glazing material manufacturer must use the guidelines established in FMVSS No. 205 to label each piece of manufactured glazing.

Permanent labeling is usually accomplished during the manufacturing process through the application of a stencil to each piece of glazing. A different stencil is required for each distinct model number. Several techniques are available for actual use of the stencil such as heat transfer, sand blasting or linking, but the most popular method for glass materials is the use of a ceramic frit (or "ink") which is applied over the stencil and then heated to a relatively high temperature to "fix" the label information to the glazing material.

There are two separate requirements for labeling glazing materials. The first requirement is that the manufacturer's assigned code number is affixed to the glazing. This requirement is termed "DOT Code Number Assignment" and is reported to OMB separately in OMB Clearance Number 2127-0038. The second requirement is for the item number of the glazing type. This OMB justification deals only with the item number assignment and labeling process, as described below.

Each manufacturer must determine that the model of glazing which is being labeled is actually in compliance with the applicable safety requirement, that suitable documentation exists in establishment of technical audit trails, and that the required sampling, testing, and procedures for implementation are suitable for production use.

The purpose of the labeling is to provide public documentation that each piece of automotive glazing material is certified by the manufacturer as being in compliance with the applicable safety requirements. If this labeling were omitted, the lack of safety labeling would cause confusion in the automotive environment: owners would be unsure that their glazing was adequate, State inspection agencies would find inspection chaotic, and glass dealers would find the replacement process incumbered by unnecessary paper work in order to determine suitable replacement material. In addition, it would be virtually impossible, in case of a serious accident or other glazing problems, to establish the origin of the glazing.

#### FMVSS No. 208, “Occupant Crash Protection”

FMVSS No. 208 currently prescribes specific labels that each manufacturer must permanently affix to either side of the sun visor, at the manufacturer’s option, at each front outboard seating position that is equipped with an inflatable restraint. Manufacturers are also required to place a removable label on either the steering wheel hub or the vehicle dash. These labels are to warn vehicle occupants about the dangers of placing children in the front passenger seat due to inflatable restraints, and that the back row seats are the safest place for children.

#### FMVSS No. 209, “Seat belt assemblies”

FMVSS No. 209 currently prescribes specific information that each manufacturer must place on each seat belt assembly whether it is for installation in a new vehicle or for aftermarket sales. If the seat belt assembly does not conform with the requirements of the standards, it cannot be offered for sale in the United States. Although the manufacturers may permanently and legibly mark the seat belt webbing with the required information, typically they use a sewn-on cloth label stamped with indelible ink. Polyester strips are fed through a printing machine, then cut into the individual labels, which are then sewn onto the webbing during the stitching operation that secures the webbing to the metal components of the seat belt assembly. The required label information provides consumers and repair facilities with the information necessary for replacement of damaged seat belt assemblies or in the event of a safety recall to correctly identify affected seat belt assemblies.

#### FMVSS No. 303, “Fuel system integrity of compressed natural gas vehicles.”

The purpose of this standard is to reduce deaths and injuries occurring from fires that result from fuel leakage during and after motor vehicle crashes. CNG vehicle manufacturers are required to ensure each label lists the service pressure to use when refueling a vehicle with CNG. Vehicle operators are also provided information on the label relating to inspection and service life of the CNG fuel container.

#### FMVSS No. 304, “Compressed natural gas fuel container integrity.”

The purpose of this standard is to reduce deaths and injuries occurring from fires that result from fuel leakage during and after motor vehicle crashes. CNG fuel container manufacturers are required to include a label on each container that lists the manufacturer’s contact information, manufacturing date, service pressure for refueling purposes, type classification, fuel type, inspection information, and end-of-life date. This information aides vehicle operators and maintenance entities in the safe usage of a CNG container during its usable lifetime.

This information is used by CNG vehicle manufacturers, fuel system integrators, fuel system inspectors, and vehicle operators. Vehicle manufactures use this information to confirm that the CNG containers installed during vehicle manufacture are correct and compatible with the vehicle design. Similarly, fuel system integrators use the information to ensure CNG containers are compatible with other fuel system components when installing and/or converting a fuel system to CNG. Fuel system safety inspectors use the information to properly inspect the CNG fuel container, as required by the label. For example, a type 4 cylinder is more sensitive to surface damage, so an inspector will note the container type before performing a visual inspection of the container. Vehicle operators may refer to the label when fueling the vehicle to ensure the fueling station will provide the correct pressure to the container. The information on the label can also be used to contact the container manufacture in the event there is a question or concern regarding the container.

#### FMVSS No. 307, “Fuel system integrity of hydrogen vehicles.”

The purpose of this standard is to reduce deaths and injuries occurring from fires that result from fuel leakage while the vehicle is in service and after motor vehicle crashes. Hydrogen fuel system manufacturers are required to include a label that lists the refueling service pressure to select when refueling the vehicle. Vehicle operators are also provided information on each label relating to inspection and service life of the hydrogen container.

#### FMVSS No. 308, “Compressed hydrogen storage system integrity.”

The purpose of this standard is to reduce deaths and injuries occurring from container burst and from fires that result from fuel leakage from the container. CHSS manufacturers are required to include a label on each container that lists the container manufacturer’s contact information, container serial number, manufacturing date, nominal working pressure (NWP), fuel type, end-of-life date, and container inspection information. This information supports vehicle operators and maintenance entities in the safe usage of the CHSS during its usable lifetime. Some of the information is also used by NHTSA for compliance testing.

**3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology. e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.**

NHTSA does not collect or process the information associated with these collection requests. The information is primarily useful to the customer or end user.

The brake fluid reservoir labeling requirements in FMVSS Nos. 105 and 135 are met by vehicle manufacturers primarily by automatically embossing or engraving the required information onto the reservoir during the reservoir manufacturing process. The FMVSS No. 303, 304, 307, and 308 labeling requirements are met by affixing a label with the required information onto the fuel container and vehicle during manufacturing. These processes do not involve the generation or storage of information by the government or the vehicle manufacturers. Information technology is used to design the process in which the required information is affixed to the brake fluid reservoir.

As for the other standards covered by this collection, NHTSA has not considered other methods of information collection or other forms of permanent notification of the identification information for the subject motor vehicle equipment. This safety information is needed throughout the useful life of the equipment and the manufacturers apparently have developed efficient, practical, and inexpensive solutions to the labeling requirements. For example, the current labeling requirements are etched on glass or other glazing, appear on metal tags affixed to the vehicle body, or are affixed to vehicle equipment, such as the brake fluid reservoir. As an alternative, a paper label affixed to the motor vehicle equipment could be used as point-of-sale information, but obviously would not be useful throughout the life of the equipment, and could be subject to accidental or inadvertent removal at any time after its initial application.

At best, to reduce the burden for glazing manufacturers in requesting an identification number, the agency is encouraging electronic submission of their information. However, the respondents may choose to submit the requested information by mail in a prescribed electronic format, such as Word and Excel. Currently, 80% of the respondents are using electronic submissions with 100% of the requested information and 20% of the respondents are submitting by mail.

**4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

Parts 571.105, "Hydraulic and electric brake systems" and 571.135, "Light vehicle brake systems"

NHTSA is the only Federal agency that mandates labeling requirements for brake fluid reservoirs. Therefore, there is no duplication of effort. Also, there is no similar information that can be used to serve the same purpose as the reservoir label requirement.

#### FMVSS No. 205, "Glazing materials"

Prior to the enactment of the National Traffic and Motor Vehicle Safety Act of 1966, manufacturers were not required to label their glazing. Those that did so were voluntarily following guidelines for marking safety glazing materials as set forth in American National Standard Z-26 -- a set of industry guidelines established by a private organization (the American National Standards Institute). These guidelines suggested that each piece of glazing be legibly and permanently marked with the words or equivalent abbreviation) "American National Standard," and the type and designation of the glass. Thus, although there was no legal requirement for labeling, a suggested format had already been established and to a large extent, was being complied with voluntarily by industry. Subsequent to the enactment of the Act of 1966, all of the above information was incorporated virtually intact by reference in FMVSS No. 205, the glazing materials standard. Thus, the previous voluntarily provided label has been made legally necessary to certify compliance to Federal safety requirements. The only additional piece of information which was added to the label was the requirement to include the manufacturer's Department of Transportation (DOT) code number assignment.

This number is assigned by special request of the prospective manufacturer in accordance with FMVSS No. 205. NHTSA is the only Federal government agency with legal authority to regulate automotive glazing. No duplication of the reporting system exists.

#### FMVSS No. 208, "Occupant crash protection"

NHTSA is the only Federal agency that mandates warning label requirements for vehicle air bags. Therefore, there is no duplication of effort. Also, there is no similar information that can be used to serve the same purpose as the air bag warning label requirement. No other Government agency has authority to require air bag warning labels inside vehicles, so there is no duplication.

#### FMVSS No. 209, "Seat belt assemblies"

Prior to the enactment of the National Traffic and Motor Vehicle Safety Act of 1966 (U.S.C. 1392), manufacturers were not required to mark or label their seat belt assemblies. The marking or labeling of seat belt assemblies was incorporated into FMVSS No. 209 as a legal requirement as a result of the Act of 1966.

Thus, similar information already available was used to the maximum extent possible, and no further modification is necessary, except as stated herein to provide for vehicle make and model designation in the label. No other Government agency has authority to require seat belt assembly labels, so there is no duplication.

FMVSS No. 303, “Fuel system integrity of compressed natural gas vehicles.”

The information required on the CNG vehicle label is required to be listed near the vehicle refueling connection, not anywhere else. Therefore, there is no duplication of effort. Also, there is no similar information that can be used to serve the same purpose as the CNG vehicle label placed near the refueling connection.

FMVSS No. 304, “Compressed natural gas fuel container integrity.”

The information required on the CNG container label is not required to be listed anywhere else. Therefore, there is no duplication of effort. Also, there is no similar information that can be used to serve the same purpose as the CNG container label requirement.

FMVSS No. 307, “Fuel system integrity of hydrogen vehicles.”

The information required on the hydrogen vehicle label is required to be listed near the vehicle fueling receptacle, not anywhere else. Therefore, there is no duplication of effort. Also, there is no similar information that can be used to serve the same purpose as the hydrogen vehicle label placed near the fueling receptacle.

FMVSS No. 308, “Compressed hydrogen storage system integrity.”

The information required on the hydrogen container label is not required to be listed anywhere else. Therefore, there is no duplication of effort. Also, there is no similar information that can be used to serve the same purpose as the hydrogen container label requirement.

**5. If the collection of information involves small businesses or other small entities, describe any methods used to minimize the burden.**

Small businesses are not involved since most labels and requests for identification numbers would be made by the manufacturer. The physical processes involved in labeling as required by the various safety standards cited in this submission are longstanding industrial practices and have reached a level where it is difficult to improve efficiency. No burden reduction is possible since the burden is already at a minimum.

**6. Describe the consequences to Federal program or policy activities if the collection is not collected or collected less frequently, as well as any technical or legal obstacles to reducing burden.**

All labeling included in this collection is placed on motor vehicle equipment at the time it is manufactured. All safety labeling requirements are necessary for vehicle use on the nation's highways. The lack of labeling could allow improper items of motor vehicle equipment to be installed on motor vehicles and could be the subject of failures or inadequate injury mitigations, increasing the risk for vehicle crashes, severe injuries and even deaths. Lack of air bag warning labels could encourage placement of children in the

front passenger seating position, where the child would be less safe in an accident than if placed in a back-row seating position. The lack of CNG container labeling could result in improper use of CNG containers resulting in a fire or explosion. Similarly, the lack of hydrogen container labeling could result in improper use of hydrogen containers resulting in a fire or explosion.

As for the identification of glazing manufacturers, the collection of information is only required one time. Absence of this DOT code mark would mean the glazing material would be available to the public without manufacturer's proof that the material passed minimum safety standards. Additionally, if the information were not collected, the ability to determine the identification of the glazing manufacturer in crashes involving defects would be placed in jeopardy.

**7. Explain any special circumstances that require the information collection to be conducted in a manner:**

- a. requiring respondents to report information to the agency more often than quarterly;**
- b. requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- c. requiring respondents to submit more than an original and two copies of any document;**
- d. requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;**
- e. in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- f. requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- g. that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- h. requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

There are no special circumstances requiring labeling requirements or assigning manufacturer glazing identification numbers to be reported in a manner inconsistent with these guidelines.

**8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to the comments. Specifically address comments received on cost and hour burden. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format, and on the data elements to be recorded, disclosed, or reported.**

NHTSA published a 60-day notice on April 8, 2026, requesting comment on NHTSA's intention to submit this ICR to OMB for approval (91 FR 17832). NHTSA didn't receive any comments.

NHTSA published a 30-day notice on September 30, 2026, that stated NHTSA's intention to submit this ICR to OMB for approval (91 FR 61920).

**9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

No payment or gift will be provided to any respondent.

**10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.**

Assurance of confidentiality is neither desired nor necessary in this situation because all of the required information is intended to be accessible to any interested party.

**11. Provide additional justification for questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

The information provided is not of a sensitive nature or commonly considered private. Therefore, no additional justification is necessary. In the assigning of glazing identification numbers, the identity of the company and information on how to get in contact with the company (such as the address) is the only information being collected.

**12. Provide estimates of the hour burden of the collection of information on the respondents and estimates of the annualized labor cost to respondents associated with that hour burden.**

FMVSS No. 105, “Hydraulic and electric brake systems”

Burden hours associated with this standard are assessed as follows:

*Annual Reservoir Plug or Cap Model Label Design*

The label statement required by 571.105 is to be permanently affixed, engraved, or embossed and located so as to be visible by direct view, either on or within 100 mm (3.94 inches) of the brake fluid reservoir filler plug or cap. Due to the limited space within engine compartments, we believe that manufacturers choose to mold the label statement onto the brake fluid reservoir plug or cap. Each manufacturer must design and develop a label design suitable for their plug or cap.

The required labels have been in use for many years. Each plug or cap label is to contain the required text along with type brake fluid. Since the text and general content for the label statement are provided, and the same plug and cap designs have been used for many years, there is no annualized burden associated with the carry-over label design. The same labels are used in both new and carry-over vehicle model lines. It is expected that manufacturers require 2.0 labor hours total each year per plug or cap design or reconfirm the label statement for continued use<sup>2</sup>. The number of brake reservoir cap and plug models requiring label statements is estimated to be 656<sup>3</sup> each year. For the label design, NHTSA uses the \$33.62 mean hourly wage for “Mechanical Drafters” (occupational code 17-3013)<sup>4</sup> to estimate this burden costs. BLS estimates that hourly wages represent approximately 70.3% of total compensation for private industry workers<sup>5</sup>. The total hourly burden cost is \$47.83.

The estimated yearly burden for the vehicle manufacturing industry to maintain the brake reservoir cap/plug text is 1,312 hours (656 models \* 2.0 hours per model) and \$62,752.96 (656 vehicle models \* 2.0 hours per each model’s reservoir plug or cap label \* \$47.83 per hour).

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<sup>2</sup> Manufacturers may use the same exact plug or cap across multiple vehicle models, reducing their overall costs through usage of common parts. For this reason, estimated costs relate to the number of unique brake reservoir plugs or caps a manufacturer uses for their vehicles, not the larger number of the manufacturer’s number of unique vehicle model variants.

<sup>3</sup> NHTSA estimates there are 656 vehicle models for which this standard is applicable. This total includes 56 medium/heavy truck models, 150 medium/large bus models, and 450 camper models. Vehicle model data from <https://www.worktruckonline.com/10185788/2023-trucks-vans-for-commercial-fleets> and <https://www.roadnotes.com/articles/rv-manufacturers/>.

<sup>4</sup> U.S. Bureau of Labor Statistics, Occupational Employment and Wages, May 2023, occupant category 17-3013 Mechanical Drafters, <https://www.bls.gov/oes/current/oes173013.htm>, accessed February 12, 2025

<sup>5</sup> U.S. Bureau of Labor Statistics, Employer Costs for Employee Compensation – June 2024, accessed February 12, 2025. (<https://www.bls.gov/news.release/pdf/ecec.pdf>)

| <b>Manufacturing of Hydraulic Brake System Label statements</b>                                                                                                                                                 |              |          |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|----------|
| <i>(1) Burden for design &amp; maintenance of brake reservoir label statements</i>                                                                                                                              |              |          |
| Approximate number of multi-purpose passenger vehicle, truck, and bus braking systems for vehicles with a GVWR greater than 3,500 kilograms (7,716 pounds) requiring hydraulic brake reservoir label statements |              | 656      |
| Technical burden per label (labor hours)                                                                                                                                                                        |              | 2.0      |
| Technical burden hourly cost (\$33.62 / 0.703)                                                                                                                                                                  |              | \$47.83  |
| <b>Total Annual label design &amp; maintenance burden</b>                                                                                                                                                       | <b>hours</b> | <b>0</b> |
|                                                                                                                                                                                                                 | <b>cost</b>  | <b>0</b> |

NHTSA estimates 127 respondents for which this standard is applicable. This includes 12 truck manufacturers, 90 camper manufactures, and 25 bus manufacturers.

#### FMVSS No. 135, “Light vehicle brake systems”

Burden hours associated with this standard are assessed as follows:

##### *Annual Reservoir Plug or Cap Model Label Design*

The label statement required by 571.135 is to be permanently affixed, engraved, or embossed and located so as to be visible by direct view, either on or within 100 mm (3.94 inches) of the brake fluid reservoir filler plug or cap. Due to the limited space within engine compartments, we believe that manufacturers choose to mold the label statement onto the brake fluid reservoir plug or cap. Each manufacturer must design and develop a label design suitable for their plug or cap.

The required labels have been in use for many years. Each plug or cap label is to contain the required text along with brake fluid type. Since the text and general content for the label statement are provided, and this label design has been in use by each vehicle manufacturer for many years, there is no annualized burden associated with the carry-over label design. The same labels are used in both new and carry-over vehicle model lines. It is expected that manufacturers require 2.0 labor hours total each year per model line to design or reconfirm the label statement for continued use. The number of vehicle model lines requiring reservoir cap label statements is estimated to be 344<sup>6</sup> each year. For the label design, NHTSA uses the \$33.62 mean hourly wage for “Mechanical Drafters” (occupational code 17-3013)<sup>7</sup> to estimate this burden’s costs. BLS estimates that hourly

<sup>6</sup> NHTSA estimates there are 344 vehicle models produced annually which are covered by this standard. This number includes 147 passenger car models and 197 light truck models. Vehicle model data from 2020 Wards Intelligence data.

wages represent approximately 70.3% of total compensation for private industry workers<sup>8</sup>. The total hourly burden cost is \$47.83.

The estimated yearly burden for the vehicle manufacturing industry to maintain the brake reservoir cap/plug text is 688 hours (344 models \* 2.0 hours per model) and \$32,907.04 (344 vehicle models \* 2.0 hours per each model's reservoir plug or cap label \* \$47.83 per hour).

| <b>Manufacturing of Hydraulic Brake System Label statements</b>                                                                                                                                                                          |              |          |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|----------|
| <i>Burden for design &amp; maintenance of brake reservoir label statements</i>                                                                                                                                                           |              |          |
| Approximate number of passenger cars and to multi-purpose passenger vehicles, trucks, and buses with a gross vehicle weight rating (GVWR) of 3,500 kilograms (7,716 pounds) or less requiring hydraulic brake reservoir label statements |              | 344      |
| Technical burden per label (labor hours)                                                                                                                                                                                                 |              | 2.0      |
| Technical burden hourly cost (\$33.62 / 0.703)                                                                                                                                                                                           |              | \$47.83  |
| <b>Total Annual label design &amp; maintenance burden</b>                                                                                                                                                                                | <b>hours</b> | <b>0</b> |
|                                                                                                                                                                                                                                          | <b>cost</b>  | <b>0</b> |

NHTSA estimates 19 respondents, all of which are light vehicle manufacturers.

#### FMVSS No. 205, “Glazing materials”

Burden hours associated with this standard are assessed as follows:

##### *(1) Request for Identification Number*

The information collection is routinely handled as part of the daily workload of the preparing office. The labor costs associated with an online application request for a manufacturer's Identification Number are derived by using hourly labor rates published by the Bureau of Labor Statistics (BLS). For the online request, NHTSA uses the mean hourly wage of \$50.44 per hour for “Project Management Specialists and Business Operations Specialists” (occupational code 13-1082)<sup>9</sup>. BLS estimates that hourly wages represent approximately 70.3% of total compensation for private industry workers<sup>10</sup>.

<sup>7</sup> U.S. Bureau of Labor Statistics, Occupational Employment and Wages, May 2023, occupant category 17-3013 Mechanical Drafters, <https://www.bls.gov/oes/current/oes173013.htm>, accessed February 12, 2025

<sup>8</sup> U.S. Bureau of Labor Statistics, Employer Costs for Employee Compensation – June 2024, accessed February 12, 2025. (<https://www.bls.gov/news.release/pdf/ecec.pdf>)

<sup>9</sup> U.S. Bureau of Labor Statistics, Occupational Employment and Wages, May 2023, occupant category 13-1082 *Project Management Specialists* <https://www.bls.gov/oes/2023/may/oes131082.htm>, accessed February 12, 2025.

Therefore, NHTSA estimates the total hourly labor cost associated with this employee of the glazing manufacturer to be \$71.75 ( $\$50.44/0.703$ ) per hour.

Estimates are based on an expected three hours to prepare the request. There is no record keeping burden attached to the respondent. New manufacturers submit one online application for each individual production facility, identifying their company as a potential manufacturer of glazing material. Therefore, based on an average of 22 new respondents per year<sup>11</sup> who request DOT code numbers, the estimated annual burden for all respondents is 66 hours and \$4,735.00<sup>12</sup> each year, assuming a \$71.75 per hour labor cost.

### *(2) Template Design for Glazing Material Certification Labels*

Each manufacturer must design and develop a label design suitable for their glazing. The manufacturer must also allow for time to suitably plan and develop an appropriate label design, and to create quality control procedures to assure that the format of the label design actually complies with the requirements stated in FMVSS No. 205.

The required labels have been in use for many years. Each glazing label is to contain the manufacturer's distinctive designation or trademark, the letters AS along with the glazing item number, and the manufacturer's DOT code mark that NHTSA assigned to the manufacturer's production facility. New glazing manufacturers will need to design an initial label template for their product(s). This layout template may be readily transferred to each new model of glazing, with specific edits containing applicable changes in glazing item number and the manufacturer's DOT code. For the purpose of this justification, it is estimated that each new manufacturer will require approximately 40 hours of design and layout effort to create a new label template for that manufacturer's glazing labels. For the label template design, NHTSA uses the mean hourly wage of \$33.62 per hour for "Mechanical Drafters" (occupational code 17-3013)<sup>13</sup>. BLS estimates that hourly wages represent approximately 70.3% of total compensation for private industry workers<sup>14</sup>. NHTSA estimates the total hourly labor cost associated with this employee of the glazing manufacturer to be \$47.83 per hour. The annual burden for manufacturers to design new label templates is 880 hours (22 manufacturers \* 40 hours per manufacturer) and \$42,090.40 (22 manufacturers \* 40 hours per manufacturer \* \$47.83 per hour).

### *(3) Annual Glazing Model Certification Label Design*

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<sup>10</sup> U.S. Bureau of Labor Statistics, Employer Costs for Employee Compensation – June 2024, accessed February 12, 2025. (<https://www.bls.gov/news.release/pdf/ecec.pdf>)

<sup>11</sup> The number of new Glazing Codes assigned to manufacturers was 21 in 2018, 27 in 2019, and 13 in the first 10 months of 2020. The yearly average number of new codes for this time period was 21.52, rounded to 22. Data from NHTSA vPIC website, <https://vpic.nhtsa.dot.gov/>.

<sup>12</sup> 22 respondents multiplied by 3.0 hour of labor per respondent multiplied by \$71.75 per hour equals \$4,735.00.

<sup>13</sup> U.S. Bureau of Labor Statistics, Occupational Employment and Wages, May 2023, occupant category 17-3013 Mechanical Drafters, <https://www.bls.gov/oes/current/oes173013.htm>, accessed February 12, 2025.

<sup>14</sup> U.S. Bureau of Labor Statistics, Employer Costs for Employee Compensation – June 2024, accessed February 12, 2025. (<https://www.bls.gov/news.release/pdf/ecec.pdf>)

After development of a manufacturer's label template, it is estimated to require 2.0 hours of effort to insert the correct DOT code and glazing item number into the template for creation of a label unique to each model of glazing. It is also estimated that 2.0 hours of effort is required annually to reverify the correct information for each carry-over model of glazing. For the purposes of this analysis, it will be necessary to estimate the total number of glazing models which are manufactured for the US market on an annual basis by glazing manufacturers. For the purpose of this evaluation, a point estimate of 10,463<sup>15</sup> glazing model numbers per year is made in order to estimate annualized costs. NHTSA estimates manufacturers assign this work to "Mechanical Drafters" (occupational code 17-3013)<sup>16</sup>. NHTSA estimates the total hourly labor cost associated with this employee of the glazing manufacturer to be \$47.83 per hour. The estimated yearly burden for the glazing manufacturing industry to design or maintain glazing labels is \$1,000,890.58 (10,463 glazing model labels \* 2.0 hours per glazing model label \* \$47.83 per hour).

#### *(4) Annual Glazing Model Cleaning Label Maintenance*

NHTSA believe that transit bus standee partitions are the only type of specialty glazing items currently in use which are required to have cleaning instruction labels. Approximately 5,300 transit buses are manufactured annually by 36 bus manufacturers<sup>17</sup>. It is estimated that each transit bus manufacturer will use a single cleaning label design. Further, these cleaning labels have been in use for many years, so there is no annual cost to develop new cleaning labels. It is expected that manufacturers require 2.0 labor hours total each year to reconfirm the label design for continued printing. The annual review of the label contents is estimated to be assigned to "Mechanical Drafters" (occupational code 17-3013)<sup>18</sup>. NHTSA estimates the total hourly labor cost associated with this employee of the glazing manufacturer to be \$47.83 per hour. The estimated yearly burden for manufacturers to maintain cleaning labels is 72 hours and \$3,443.76 (36 glazing cleaning labels \* 2.0 hours per cleaning label \* \$47.83 per hour).

| <b>Cost Burden from FMVSS No. 205 Labeling Requirements</b>   |    |
|---------------------------------------------------------------|----|
| <i>(1) Request for Identification Number</i>                  |    |
| Number of glazing manufacturers requesting DOT manufacturer's | 22 |

<sup>15</sup> It is estimated that there are 147 passenger vehicle models requiring 8 glazing model numbers, 197 light truck models requiring 15 glazing model numbers, 56 medium/heavy truck models requiring 9 glazing model numbers, 150 light and medium bus models requiring 8 glazing models, 450 motorcycle models requiring 1 glazing model, 108 slide-in camper models requiring 2 glazing model numbers, 438 camper models requiring 7 glazing model numbers, 9 pick-up bed cover window sets requiring 3 glazing models, and 33 low speed vehicle models requiring 4 glazing model numbers. The total estimated number of glazing model numbers is 10,463 [(147 \* 8) + (197 \* 15) + (56 \* 9) + (150 \* 8) + (475 \* 1) + (108 \* 2) + (438 \* 7) + (9 \* 3) + (33\*4)].

<sup>16</sup> U.S. Bureau of Labor Statistics, Occupational Employment and Wages, May 2023, occupant category 17-3013 Mechanical Drafters, <https://www.bls.gov/oes/current/oes173013.htm>, accessed February 12, 2025

<sup>17</sup> David Czerwinski et al., *The US Transit Bus Manufacturing Industry* (Mineta Transportation Institute, 2016), 10. Available online via <https://transweb.sjsu.edu/sites/default/files/1234-US-transit-bus-mfg-industry.pdf>, last accessed January 11, 2021.

<sup>18</sup> U.S. Bureau of Labor Statistics, Occupational Employment and Wages, May 2023, occupant category 17-3013 Mechanical Drafters, <https://www.bls.gov/oes/current/oes173013.htm>, accessed February 12, 2025.

|                                                                            |              |              |
|----------------------------------------------------------------------------|--------------|--------------|
| code per year                                                              |              |              |
| Application burden (labor hours) per manufacturer                          |              | 3.0          |
| Manufacturer hourly cost burden (\$50.44 / 0.703)                          |              | \$71.75      |
| <b>Annual application burden</b>                                           | <b>hours</b> | <b>22</b>    |
|                                                                            | <b>cost</b>  | <b>0</b>     |
| <i>(2) New Manufacturers' Glazing Certification Label Template Designs</i> |              |              |
| Number of new glazing label templates per year                             |              | 22           |
| Technical annual burden for each new label template                        |              | 40.0         |
| Technical burden hourly cost (\$33.62 / 0.703)                             |              | \$47.83      |
| <b>New label template annual burden</b>                                    | <b>hours</b> | <b>880</b>   |
|                                                                            | <b>cost</b>  | <b>0</b>     |
| <i>(3) Annual Glazing Model Certification Label Design</i>                 |              |              |
| Annual number of glazing model labels                                      |              | 10,463       |
| Technical burden per label (labor hours)                                   |              | 2.0          |
| Technical burden hourly cost (\$33.62 / 0.703)                             |              | \$47.83      |
| <b>Label design &amp; maintenance burden</b>                               | <b>hours</b> | <b>0</b>     |
|                                                                            | <b>cost</b>  | <b>0</b>     |
| <i>(4) Annual Glazing Model Cleaning Label Maintenance</i>                 |              |              |
| Annual number of glazing cleaning labels                                   |              | 36           |
| Technical burden per label (labor hours)                                   |              | 2.0          |
| Technical burden hourly cost (\$33.62 / 0.703)                             |              | \$47.83      |
|                                                                            | <b>hours</b> | <b>72</b>    |
|                                                                            | <b>cost</b>  | <b>0</b>     |
| <b>Total annual burden – Label Creation</b>                                | <b>hours</b> | <b>21864</b> |
|                                                                            | <b>cost</b>  | <b>0</b>     |

## FMVSS No. 208, “Occupant Crash Protection”

Burden hours associated with this standard are assessed as follows:

### *(1) Labels for air bag maintenance or replacement schedules*

There are currently no vehicle manufacturers using air bags that require replacement or periodic maintenance. If such air bags were to be in use, the manufacturer would obtain necessary data relating to replacement and maintenance schedules from the air bag supplier and that this information would be placed into a manufacturer’s vehicle database system. The schedules are to be specified by month and year, or in terms of vehicle mileage, or by intervals measured from the date appearing on the vehicle certification label provided pursuant to 49 CFR part 567. Manufacturers may choose to create a unique label for any replacement and maintenance schedules, or the information may be added to the sun visor air bag warning label specified in FMVSS No. 208, S4.5.1(b). Manufacturers needing to provide air bag maintenance or replacement schedules would pick the more economical option of adding this information to the labels specified in S4.5.1(b). The basic format of the sun visor air bag warning labels specified in FMVSS No. 208, Figures 6a and 6b, can be readily altered to include schedule and maintenance information. This design been in use by manufacturers for many years, therefore, there is no annualized burden associated with the design. Total annual administrative burden to develop schedule information, alter the sun visor air bag warning label with the new information, and send the completed label for printing is estimated to be on the order of 4.0 labor hours per manufacturer for each warning label required for a vehicle model line. This burden would be applicable to new vehicle models, not any carry-over model vehicles. Labels for carry-over vehicle model lines would require no new label design effort. For the label template design, NHTSA uses the mean hourly wage of \$33.62 per hour for “Mechanical Drafters” (occupational code 17-3013)<sup>19</sup>. BLS estimates that hourly wages represent approximately 70.3% of total compensation for private industry workers. NHTSA estimates the total hourly labor cost associated with this employee to be \$47.83 per hour. Since no manufacturers equip vehicles with air bags requiring maintenance or replacement, there is no annual administrative burden to include such information on any vehicle label.

### *(2) Sun visor air bag warning label*

Each vehicle shall have a label permanently affixed to either side of the sun visor, at the manufacturer’s option, at each front outboard seating position that is equipped with an inflatable restraint. The label shall conform in content to the label shown in either Figure 6a or 6b of FMVSS No. 208, as appropriate, and shall comply with the requirements of S4.5.1(b)(1)(i) through S4.5.1(b)(1)(iv). The basic format of the sun visor air bag warning labels is specified in FMVSS No. 208, Figures 6a and 6b. Since the minimum required format and contents for the label are provided, and this label design has been in use by

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<sup>19</sup> U.S. Bureau of Labor Statistics, Occupational Employment and Wages, May 2023, occupant category 17-3013 Mechanical Drafters, <https://www.bls.gov/oes/current/oes173013.htm>, accessed February 12, 2025.

each vehicle manufacturer for many years, there is no annualized burden associated with the carry-over label design. The same labels are used in both new and carry-over vehicle model lines. It is expected that manufacturers require 1.0 labor hours total each year per model line to reconfirm the label design for continued printing. The number of vehicle model lines requiring air bag warning labels is estimated to be 550 each year<sup>20</sup>. For the label design reconfirmation, NHTSA uses the mean hourly wage for “Mechanical Drafters” (occupational code 17-3013) to estimate this burden costs.<sup>21</sup> BLS estimates that hourly wages represent approximately 70.3% of total compensation for private industry workers. NHTSA estimates the total hourly labor cost associated with this employee to be \$47.83 per hour. The estimated yearly burden for the vehicle manufacturing industry to maintain air bag warning labels is 550 hours (550 vehicle models \* 1.0 hours per each model’s air bag label) and the cost burden is \$26,306.50 (550 vehicle models \* 1.0 hours per each model’s air bag label \* \$47.83 per hour).

### *(3) Dashboard or steering wheel hub bag warning label*

FMVSS No. 208 requires that “[e]ach vehicle that is equipped with an inflatable restraint for the passenger position shall have a label attached to a location on the dashboard or the steering wheel hub that is clearly visible from all front seating positions. The label need not be permanently affixed to the vehicle. This label shall conform in content to the label shown in Figure 7 of FMVSS No. 208.” Since the minimum required format and contents for the label are provided, and this label design has been in use by each vehicle manufacturer for many years, there is no annualized burden associated with the carry-over label design. The same labels are used in both new and carry-over vehicle model lines. It is expected that manufacturers require 1.0 person-hours total each year per model line to reconfirm the label design for continued printing. The number of vehicle model lines requiring dashboard or steering wheel warning labels is estimated to be 550 each year. For the label design reconfirmation, NHTSA uses the mean hourly wage for “Mechanical Drafters” (occupational code 17-3013) to estimate this burden costs. The estimated yearly burden for the vehicle manufacturing industry to maintain dashboard or steering wheel warning labels is 550 hours (550 vehicle models \* 1.0 hours per each model’s air bag label) and the cost burden is \$26,306.50 (550 vehicle models \* 1.0 hours per each model’s air bag label \* \$47.83 per hour).

### *Total*

The total FMVSS No. 208 annual burden to manufacturers for label development is 1,100 hours and \$52,613. NHTSA estimates there are 115 respondents (manufacturers) for which the FMVSS No. 208 requirements for airbag labels is applicable. This includes 50 passenger car manufacturers, 20 light truck and van manufactures, 20 medium and heavy trucks, and 25 large and medium bus manufacturers.

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<sup>20</sup> NHTSA estimates there are 550 vehicle models requiring sun visor labels annually (147 passenger car, 197 light truck, 56 medium/heavy truck, and 150 large/medium bus models). Vehicle models were identified in Polk’s National Vehicle Population Profile.

<sup>21</sup> U.S. Bureau of Labor Statistics, Occupational Employment and Wages, May 2023, occupant category 17-3013 Mechanical Drafters, <https://www.bls.gov/oes/current/oes173013.htm>, accessed February 12, 2025.

| <b>Annual Burden from FMVSS No. 208 Labeling Requirements</b>                    |                     |                     |
|----------------------------------------------------------------------------------|---------------------|---------------------|
| <i>(1) Labels for air bag maintenance or replacement schedules</i>               |                     |                     |
| Vehicle models with airbags requiring maintenance or replacement                 |                     | 0                   |
| Burden hours per model to develop labels with schedules                          |                     | 4.0                 |
| Technical burden hourly cost (\$33.62/ 0.703)                                    |                     | \$47.83             |
| <b><i>Burden for labels w/ maintenance &amp; replacement</i></b>                 | <b><i>Hours</i></b> | <b><i>0</i></b>     |
|                                                                                  | <b><i>Cost</i></b>  | <b><i>\$0</i></b>   |
| <i>(2) Burden to reconfirm sun visor label design per year</i>                   |                     |                     |
| Number of vehicle models requiring warning labels per year                       |                     | 550                 |
| Total burden to support each label (labor hours)                                 |                     | 1.0                 |
| Technical burden hourly cost (\$33.62 / 0.703)                                   |                     | \$47.83             |
| <b><i>Annualized sun visor label design burden</i></b>                           | <b><i>hours</i></b> | <b><i>550</i></b>   |
|                                                                                  | <b><i>cost</i></b>  | <b><i>0</i></b>     |
| <i>(3) Burden to reconfirm dashboard or steering wheel label design per year</i> |                     |                     |
| Number of vehicle models requiring warning labels per year                       |                     | 550                 |
| Total burden to support each label (labor hours)                                 |                     | 1.0                 |
| Technical burden hourly cost (\$28.37 / 0.703)                                   |                     | \$47.83             |
| <b><i>Annualized dashboard label design burden</i></b>                           | <b><i>hours</i></b> | <b><i>550</i></b>   |
|                                                                                  | <b><i>cost</i></b>  | <b><i>0</i></b>     |
| <b>Total annual burden – Label Creation</b>                                      | <b><i>hours</i></b> | <b><i>1,100</i></b> |
|                                                                                  | <b><i>cost</i></b>  | <b><i>0</i></b>     |

FMVSS No. 209, “Seat belt assemblies”

Burden hours associated with this standard are assessed as follows:

*(1) Seat belt assembly label creation from generalized template design – S4.1(j)*

Each seat belt manufacturers utilizes a generalized template for the information to include in their seat belt labels. The basic format of each manufacturer’s label has not changed, and a onetime design of the label template was created many years ago. Therefore, there is no new annualized burden associated with template development. Specific seat belt assembly labels can be readily created through insertion of a seat belt assembly’s specific information into the generalized template. The annual administrative burden to either develop a new label or reconfirm an existing label is estimated to be on the order of 2.0 labor hours per manufacturer for each seat belt assembly model. For the purpose of this evaluation, a point estimate of 4,894<sup>22</sup> seat belt assembly model labels per year is made in order to estimate annualized costs. For the label design, NHTSA uses the mean hourly wage of \$33.62 per hour for “Mechanical Drafters” (occupational code 17-3013)<sup>23</sup>. BLS estimates that hourly wages represent approximately 70.3% of total compensation for private industry workers<sup>24</sup>. NHTSA estimates the total hourly labor cost associated with this employee to be \$47.83 per hour. The annual burden for manufacturers to develop seat belt assembly labels is 9,788 hours (4,894 label designs \* 2.0 hours per label) and \$468,160.04 (4,894 label designs \* 2.0 hours per label design \* \$47.83 per hour).

NHTSA estimates 20 respondents, all of which are seat belt assembly manufacturers.

| Creation of Seat Belt Assembly Label                                                    |              |          |
|-----------------------------------------------------------------------------------------|--------------|----------|
| <i>(1) Seat belt assembly label creation from generalized template design – S4.1(j)</i> |              |          |
| Number of seat belt assembly model labels                                               |              | 4,894    |
| Technical burden per label (labor hours)                                                |              | 2.0      |
| Technical burden hourly cost (\$33.62 / 0.703)                                          |              | \$47.83  |
| <b>Total annual burden – Label Creation</b>                                             | <b>Hours</b> | <b>0</b> |
|                                                                                         | <b>Cost</b>  | <b>0</b> |

#### FMVSS No. 303, “Fuel system integrity of compressed natural gas vehicles.”

Burden hours associated with this standard are assessed as follows:

##### *(1) CNG Vehicle label creation from generalized template design*

<sup>22</sup> For the estimated 147 passenger car, 197 light truck, 150 medium/heavy truck, 156 medium/heavy bus, 438 RV camper models, and 33 low-speed vehicle models there are an estimated average of 5, 7, 5, 3, 2, and 5 unique seat belt assemblies, respectively, per vehicle type. Each seat belt assembly has 1 label per seat belt assembly model. Estimate that there are 20 manufacturers producing universal seat belt assemblies, each manufacturer selling 25 unique models, for an added 500 annual seat belt assembly labels. This equates to a total of 4,894 unique seat belt assembly model labels.

<sup>23</sup> U.S. Bureau of Labor Statistics, Occupational Employment and Wages, May 2023, occupant category 17-3013 Mechanical Drafters, <https://www.bls.gov/oes/current/oes173013.htm>, accessed February 12, 2025.

<sup>24</sup> U.S. Bureau of Labor Statistics, Employer Costs for Employee Compensation – June 2024, accessed February 12, 2025. (<https://www.bls.gov/news.release/pdf/ecec.pdf>)

Each CNG vehicle is to have a permanent label near the vehicle refueling connection. The label is to contain the CNG service pressure as well as the specific statement “See instructions on fuel container for inspection and service life.” The required text for the label is specified in FMVSS No. 303, S5.3.1 and S5.3.2, so there is no annual burden for the manufacturer to develop a generalized template for the label. The manufacturer is only required to insert the numerical value for a particular vehicle’s service pressure into the specified text. Each manufacturer only needs two different labels since there are only two service pressures, 3,000 and 3,600 psi, for refueling CNG vehicles. The annual administrative burden to either develop a new label or review an existing label which complies with the requirements contained in FMVSS No. 303 is estimated to be on the order of 1.0 labor hours per manufacturer for each CNG vehicle model. For the purpose of this evaluation, a point estimate of 74 CNG vehicle model labels<sup>25</sup> per year is made in order to estimate annualized costs. For the label design, NHTSA uses the mean hourly wage of \$33.62 per hour for “Mechanical Drafters” (occupational code 17-3013)<sup>26</sup>. BLS estimates that hourly wages represent approximately 70.3% of total compensation for private industry workers<sup>27</sup>. NHTSA estimates the total hourly labor cost associated with this employee to be \$47.83 per hour. The annual burden for manufacturers to develop CNG vehicle labels is 74 hours (74 vehicle model labels \* 1.0 hour per model) and \$3,539.42 (74 CNG vehicle model label designs \* 1.0 hours per label design \* \$47.83 per hour).

NHTSA estimates 37 respondents, all of which are CNG vehicle manufacturers or retrofitters.

| Creation of CNG Vehicle Label                                          |              |          |
|------------------------------------------------------------------------|--------------|----------|
| <i>(1) CNG vehicle label creation from generalized template design</i> |              |          |
| Number of CNG vehicle model labels                                     |              | 74       |
| Technical burden per label (labor hours)                               |              | 1.0      |
| Technical burden hourly cost (\$33.62 / 0.703)                         |              | \$47.83  |
| <b>Total annual burden – Label Creation</b>                            | <b>Hours</b> | <b>0</b> |
|                                                                        | <b>Cost</b>  | <b>0</b> |

FMVSS No. 304, “Compressed natural gas fuel container integrity.”

Burden hours associated with this standard are assessed as follows:

<sup>25</sup> An estimated 37 manufacturers are producing CNG vehicles covered by FMVSS No. 303. Each manufacturer will need at most 2 labels. Total estimate of CNG vehicle model labels is 37 manufacturers multiplied by 2 labels per manufacturer, producing a total estimate of 74 CNG vehicle model labels.

<sup>26</sup> U.S. Bureau of Labor Statistics, Occupational Employment and Wages, May 2023, occupant category 17-3013 Mechanical Drafters, <https://www.bls.gov/oes/current/oes173013.htm>, accessed February 12, 2025.

<sup>27</sup> U.S. Bureau of Labor Statistics, Employer Costs for Employee Compensation – June 2024, accessed February 12, 2025. (<https://www.bls.gov/news.release/pdf/ecec.pdf>)

*(1) CNG Fuel Container label creation from generalized template design*

Each CNG fuel container is to have a permanent label in place for the manufacturer's recommended service life of the container. The required text for the label is specified in FMVSS No. 304, S7.4, paragraphs (a) through (h). This text is suitable for use as a generalized template, therefore there is no annual burden for the manufacturer to develop a generalized template for the label. The manufacturer is only required to insert their contact information, date of container manufacturer, service pressure, and date for the end of the recommended service life of the container. Each container manufacturer only needs two different labels since there are only two service pressures, 3,000 and 3,600 psi, for refueling CNG vehicles. The annual administrative burden to develop a label which complies with the requirements contained in FMVSS No. 304 is estimated to be on the order of 1.0 labor hours per manufacturer for each CNG fuel container model. For the purpose of this evaluation, a point estimate of 200 CNG fuel container model labels<sup>28</sup> per year is made in order to estimate annualized costs. For the label design, NHTSA uses the mean hourly wage of \$33.62 per hour for "Mechanical Drafters" (occupational code 17-3013)<sup>29</sup>. BLS estimates that hourly wages represent approximately 70.3% of total compensation for private industry workers<sup>30</sup>. NHTSA estimates the total hourly labor cost associated with this employee to be \$47.83 per hour. The annual burden for manufacturers to develop CNG fuel container labels is 200 hours (200 fuel container model labels \* 1.0 hour per model) and \$49,566.00 (200 CNG vehicle model label designs \* 1.0 hours per label design \* \$47.83 per hour).

NHTSA estimates 100 respondents, all of which are CNG container manufacturers.

| Creation of CNG Vehicle Label                                          |              |          |
|------------------------------------------------------------------------|--------------|----------|
| <i>(1) CNG vehicle label creation from generalized template design</i> |              |          |
| Number of CNG vehicle model labels                                     |              | 200      |
| Technical burden per label (labor hours)                               |              | 1.0      |
| Technical burden hourly cost (\$28.37 / 0.703)                         |              | \$47.83  |
| <b>Total annual burden – Label Creation</b>                            | <b>Hours</b> | <b>0</b> |
|                                                                        | <b>Cost</b>  | <b>0</b> |

FMVSS No. 307, "Fuel system integrity of hydrogen vehicles."

*Annual costs to produce hydrogen vehicle labels*

Each hydrogen vehicle is to have a permanent label near the vehicle fueling receptacle. The label is to contain the hydrogen service pressure as well as the specific statement "See

<sup>28</sup> An estimated 200 CNG fuel container model labels are based on an estimated 100 container manufacturers each needing 2 label designs.

<sup>29</sup> U.S. Bureau of Labor Statistics, Occupational Employment and Wages, May 2023, occupant category 17-3013 Mechanical Drafters, <https://www.bls.gov/oes/current/oes173013.htm>, accessed February 12, 2025.

<sup>30</sup> U.S. Bureau of Labor Statistics, Employer Costs for Employee Compensation – June 2024, accessed February 12, 2025. (<https://www.bls.gov/news.release/pdf/ecec.pdf>)

instructions on fuel container for inspection and service life.” The required text for the label is specified in FMVSS No. 307, S5.1.1(b), so there is no annual burden for the manufacturer to develop a generalized template for the label. The manufacturer is only required to insert the numerical value for a particular vehicle’s service pressure into the specified text. The annual administrative burden to develop a label which complies with the requirements contained in FMVSS No. 307 is estimated to be on the order of 1.0 labor hours per manufacturer for each hydrogen vehicle model. For the purpose of this evaluation, a point estimate of 10 hydrogen vehicle model labels (10 manufacturers \* 1 label per manufacturer) per year is made in order to estimate annualized costs. For the label design, NHTSA uses the mean hourly wage of \$33.62 per hour for “Mechanical Drafters” (occupational code 17-3013). BLS estimates that hourly wages represent approximately 70.3% of total compensation for private industry workers. NHTSA estimates the total hourly labor cost associated with this employee to be \$47.83 per hour. The annual burden for manufacturers to develop hydrogen vehicle labels is 10 hours (10 vehicle model labels \* 1.0 hour per model) and \$478.30 (10 hydrogen vehicle model label designs \* 1.0 hours per label design \* \$47.83 per hour).

| Creation of Hydrogen Vehicle Label                                                       |              |          |
|------------------------------------------------------------------------------------------|--------------|----------|
| <i>(1) Hydrogen vehicle label creation from generalized template design</i>              |              |          |
| Number of hydrogen vehicle model labels<br>(10 manufacturers * 1 label per manufacturer) |              | 10       |
| Technical burden per label (labor hours)                                                 |              | 1.0      |
| Technical burden hourly cost (\$33.62 / 0.703)                                           |              | \$47.83  |
| <b>Total annual burden – Label Creation</b>                                              | <b>Hours</b> | <b>0</b> |
|                                                                                          | <b>Cost</b>  | <b>0</b> |

FMVSS No. 308, “Compressed hydrogen storage system integrity.”

#### *Annual costs to produce hydrogen vehicle labels*

Each hydrogen container is to have a permanent label in place on the hydrogen container. The required text for the label is specified in FMVSS No. 308, S5.1.6, paragraphs (a) through (h). This text is suitable for use as a generalized template, therefore there is no annual burden for the manufacturer to develop a generalized template for the label. The manufacturer is only required to insert their contact information, container serial number, manufacturing date, and date of removal from service. The annual administrative burden to develop a label which complies with the requirements contained in FMVSS No. 308 is estimated to be on the order of 1.0 labor hours per manufacturer for each hydrogen fuel container model. For the purpose of this evaluation, a point estimate of 10 hydrogen fuel container model labels per year is made in order to estimate annualized costs. For the label design, NHTSA uses the mean hourly wage of \$33.62 per hour for “Mechanical Drafters” (occupational code 17-3013). BLS estimates that hourly wages represent approximately 70.3% of total compensation for private industry workers. NHTSA estimates the total hourly labor cost associated with this employee to be \$47.83 per hour. The annual burden

for manufacturers to develop hydrogen container labels is 10 hours (10 container model labels \* 1.0 hour per model) and \$478.30 (10 hydrogen vehicle model label designs \* 1.0 hours per label design \* \$47.83 per hour).

| Creation of Hydrogen Container Label                                   |              |          |
|------------------------------------------------------------------------|--------------|----------|
| <i>(1) CNG vehicle label creation from generalized template design</i> |              |          |
| Number of hydrogen vehicle model labels                                |              | 10       |
| Technical burden per label (labor hours)                               |              | 1.0      |
| Technical burden hourly cost (\$33.62 / 0.703)                         |              | \$47.83  |
| <b>Total annual burden – Label Creation</b>                            | <b>Hours</b> | <b>0</b> |
|                                                                        | <b>Cost</b>  | <b>0</b> |

In Summary, the total estimated cost and hourly burden of the collection of information on the respondents is 35,126 hours and \$1,681,656.

| FMVSS | Type Respondent                             | Number of Respondents | Annual Responses | Burden per Response (hours) | Estimated Yearly Burden Hours | Labor Rate | Estimated Yearly Cost Burden |
|-------|---------------------------------------------|-----------------------|------------------|-----------------------------|-------------------------------|------------|------------------------------|
| 105   | Brake reservoir cap manufacturers           | 15                    | 656              | 2.0                         | 0                             | \$47.83    | 0                            |
| 135   | Brake reservoir cap manufacturers           | 15                    | 344              | 2.0                         | 0                             | \$47.83    | 0                            |
| 205   | New glazing manufacturer – DOT ID           | 22                    | 22               | 3.0                         | 0                             | \$71.75    | 0                            |
|       | Glazing manufacturers – new templates       | 22                    | 22               | 40.0                        | 0                             | \$47.83    | 0                            |
|       | Glazing manufacturers – label design        | 40                    | 10,463           | 2.0                         | 0                             | \$47.83    | 0                            |
|       | Glazing manufacturers – bus cleaning labels | 36                    | 36               | 2.0                         | 0                             | \$47.83    | 0                            |
| 208   | Vehicle manufacturers – replacement airbags | 115                   | 0                | 2.0                         | 0                             | \$47.83    | \$0.00                       |
|       | Vehicle manufacturers – sun visor label     | 115                   | 550              | 1.0                         | 0                             | \$47.83    | 0                            |
|       | Vehicle manufacturers – dashboard label     | 115                   | 550              | 1.0                         | 0                             | \$47.83    | 0                            |

|              |                                             |    |       |     |          |         |          |
|--------------|---------------------------------------------|----|-------|-----|----------|---------|----------|
| 209          | Seat belt manufacturers                     | 20 | 4,894 | 2.0 | 0        | \$47.83 | 0        |
| 303          | CNG Vehicle manufacturers                   | 37 | 74    | 1.0 | 0        | \$47.83 | 0        |
| 304          | CNG Fuel Container Manufacturers            | 37 | 100   | 2.0 | 0        | \$47.83 | 0        |
| 307          | Hydrogen vehicle manufacturers              | 10 | 10    | 1.0 | 0        | \$47.83 | 0        |
| 308          | Compressed hydrogen container manufacturers | 10 | 10    | 1.0 | 0        | \$47.83 | 0        |
| <b>Total</b> |                                             |    |       |     | <b>0</b> |         | <b>0</b> |

**13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. Do not include the cost of any hour burden already reflected in the response provided in question 12.**

FMVSS No. 105, “Hydraulic and electric brake systems”

*Annual costs to produce all the reservoir plug and cap label statements*

For the purposes of this analysis, it will be necessary to estimate the total number of reservoir plugs and caps which are sold for the US vehicle market on an annual basis by reservoir plug and cap manufacturers. Manufacturers mold the label statement onto the top of the reservoir plugs and caps. NHTSA estimates there is no additional time required for forming the plugs and caps due to the label statements. There is additional manufacturing cost due to the added material and any contrasting color to the raised or embossed lettering. For the purpose of this evaluation, a point estimate of 1,295,694 reservoir plugs and caps<sup>31</sup> per year is used to estimate annualized costs. NHTSA estimates that the addition of the required statement adds \$0.01839 to the cost of each plug and cap. This additional cost also reflects the manufacturer's allocation of capital expenditures and equipment depreciation to the cost of each part. Allowing for an added 10% production for spare parts, the total annual cost to apply labels to the reservoir plugs and caps is \$26,210.59 (1,295,694 \* 1.1 \* \$0.01839).

| <b>Manufacturing Burden Cost from FMVSS No. 105 Labeling Requirements</b> |           |
|---------------------------------------------------------------------------|-----------|
| <i>Annual Production Cost for Reservoir Plug and Cap Labels</i>           |           |
| Annual Number of Reservoir Plug and Cap Labels                            | 1,295,694 |

<sup>31</sup> There is one cap or plug per vehicle covered by FMVSS No. 105. There are 806,800 medium/heavy trucks, 20,000 medium/large buses, and 468,894 RV campers produced annually which are covered by this standard. The total covered vehicles, or total cap and plugs, is 1,295,694 (806,800 + 20,000 + 468,894).

|                                                                      |                 |
|----------------------------------------------------------------------|-----------------|
| Part cost to apply labels                                            | \$0.01839       |
| 10% factor for replacement parts                                     | 1.1             |
| <b><i>Annual manufacturing cost burden for label application</i></b> | <b><i>0</i></b> |

FMVSS No. 135, “Light vehicle brake systems”

*Annual costs to produce all the reservoir plug and cap label statements*

For the purposes of this analysis, it will be necessary to estimate the total number of reservoir plugs and caps which are sold for the US vehicle market on an annual basis by glazing manufacturers. Manufacturers mold the label statement onto the top of the reservoir plugs and caps. NHTSA estimates there is no additional time required for forming the plugs and caps due to the label statements. There is additional manufacturing time required to apply contrasting color to the raised or embossed lettering. For the purpose of this evaluation, a point estimate of 14,694,582 reservoir plugs and caps<sup>32</sup> per year is used to estimate annualized costs. Allowing for an added 10% production for spare parts, the total annual cost to apply labels to the reservoir plugs and caps is \$297,256.71 (14,694,582 \* 1.1 \* \$0.01839). This cost also reflects the manufacturer's allocation of capital expenditures and equipment depreciation to the cost of each part.

| <b>Manufacturing Burden Cost from FMVSS No. 135 Labeling Requirements</b> |                 |
|---------------------------------------------------------------------------|-----------------|
| <i>Annual Production Cost for Reservoir Plug and Cap Labels</i>           |                 |
| Annual Number of Reservoir Plug and Cap Labels                            | 14,694,582      |
| Part cost to apply labels                                                 | \$0.01839       |
| 10% factor for replacement parts                                          | 1.1             |
| <b><i>Annual manufacturing cost burden for label application</i></b>      | <b><i>0</i></b> |

FMVSS No. 205, “Glazing materials”

*(1) Annual costs to produce all the glazing certification labels*

For the purposes of this analysis, it will be necessary to estimate the total number of glazing panels which are sold for the US vehicle market on an annual basis by glazing manufacturers. For the purpose of this evaluation, a point estimate of 124,754,397 glazing

<sup>32</sup> There is one cap or plug per vehicle covered by FMVSS No. 135. It is estimated that there are 14,694,582 reservoir caps required for the 3,094,840 passenger cars and 11,599,743 light truck vehicles produced annually which are covered under FMVSS No. 135.

panels<sup>33</sup> per year used to estimate annualized costs. Two different methods are used to affix the required markings to glazing panels. One method utilizes a ceramic paint process. It is estimated that 90% of glazing panels are marked using this method, costing on average \$0.01839 per glazing panel. The remaining 10% of the panels are marked using a sand blasting method, costing on average \$0.05517 per glazing panel. This cost also reflects the manufacturer's allocation of capital expenditures and equipment depreciation to the cost of each part. Allowing for an added 10% production for spare parts, the total annual cost to apply labels to the glazing panels is \$3,028,388.28 ( $0.90 * 124,754,397 * 1.1 * 0.01839 + 0.10 * 124,754,397 * 1.1 * 0.05517$ ).

## *(2) Annual Production Cost for Glazing Cleaning Labels*

Manufacturers are required to affix a label, removable by hand without tools, to certain types of plastic glazing materials. The label is to identify the product involved as well as specify instructions and agents for cleaning the material that will minimize the loss of transparency. It is estimated that this type of glazing is used as standee partitions in transit buses. There are an estimated 5,300 transit buses produced annually, with an average of two partitions per bus, at an estimated cost of \$0.895 per label. This cost also reflects the manufacturer's allocation of capital expenditures and equipment depreciation to the cost of each part. Allowing for an added 10% production for spare parts, the total annual cost to apply these removable labels to the glazing panels is \$15,653.20 ( $5,300 * 1 * 3 * 1.1 * \$0.895$ ).

| <b>Manufacturing Cost Burden from FMVSS No. 205 Labeling Requirements</b> |                 |
|---------------------------------------------------------------------------|-----------------|
| <i>(1) Annual Production Cost for Glazing Certification Labels</i>        |                 |
| Annual Number of glazing labels                                           | 124,754,407     |
| 10% factor for replacement parts                                          | 1.1             |
| Cost per ceramic paint label – 90% of panels                              | \$0.01839       |
| Cost per sand blasted label – 10% of panels                               | \$0.05517       |
| <b><i>Annual manufacturing cost burden – certification labels</i></b>     | <b><i>0</i></b> |
| <i>(2) Annual Production Cost for Glazing Cleaning Labels</i>             |                 |

<sup>33</sup> It is estimated that there are 3,094,840 passenger cars each with 8 glazing units, 11,599,743 light truck vehicles each with 8 glazing units, 491,573 medium/heavy truck vehicles each with 6 glazing units, 20,000 medium and heavy bus vehicles each with 8 glazing units, 550,000 motorcycles each with 1 glazing unit, 11,000 slide-in campers each with 3 glazing units, 464,757 campers each with 7 glazing units, 8,000 pick-up bed covers each with 4 glazing units, and 55,000 low speed vehicles with 4 glazing units. The total estimated number of glazing units is 124,754,397 [ $(3,094,840 * 8) + (11,599,743 * 8) + (491,574 * 6) + (20,000 * 8) + (550,000 * 1) + (11,000 * 3) + (464,757 * 7) + (8,000 * 4) + (55,000 * 4)$ ].

|                                                                  |                        |
|------------------------------------------------------------------|------------------------|
| Labels per standee partition                                     | 1                      |
| Average number of partitions per transit bus                     | 3                      |
| Annual transit bus production                                    | 5,300                  |
| 10% factor for replacement parts                                 | 1.1                    |
| Cost per applied label                                           | \$0.8950               |
| <b><i>Annual manufacturing cost burden – cleaning labels</i></b> | <b><i>\$15,653</i></b> |
| <b>Total annual manufacturing cost – glazing labels</b>          | <b>\$3,044,041</b>     |

FMVSS No. 208, “Occupant Crash Protection”

*(1) Annual Burden to Produce Sun Visor Air Bag Warning Labels*

Each of the 15,206,156<sup>34</sup> vehicles are required to have air bag warning labels at each front outboard seating position equipped with an inflatable restraint. The air bag warning labels are printed directly onto the sun visors. NHTSA estimates there 30,392,313 sun visors<sup>35</sup> with warning labels produced annually. It is further estimated that manufacturers produce an additional 10% of the sun visors as spare parts. The per sun visor cost for the air bag warning labels is estimated to be \$0.228. NHTSA estimates that it costs \$7,622,392.35 (30,392,314 air bag warning labels \* 1.1 spare parts factor \* \$0.2280 per applied label) annually for manufacturers to apply the airbag warning labels to sun visors. This cost also reflects the manufacturer's allocation of capital expenditures and equipment depreciation to the cost of each part.

*(2) Annual Burden to Produce Dashboard Air Bag Warning Labels*

Each of the 15,206,156<sup>36</sup> vehicles are required to have an air bag warning label, which need not be permanent, attached to a location on the dashboard or the steering wheel hub that is clearly visible from all front seating positions. For the purposes of this analysis, a non-permanent label with an average cost of \$0.472 is estimated to be used by vehicle

<sup>34</sup> NHTSA estimates there are total of 15,206,156 vehicles requiring air bag labels annually. This total includes 3,094,840 passenger cars; 11,599,743 light truck vehicles, 491,573 medium and heavy trucks; and 20,000 medium and heavy buses.

<sup>35</sup> NHTSA estimates there are a total of 30,392,311 sun visors with warning labels produced annually. This total includes 2 warning labels in the 3,094,840 passenger cars; 11,599,743 light truck vehicles, and 491,573 medium and heavy trucks. There is a sun visor with an air bag warning label in each of the 20,000 medium and heavy buses.  $\{30,392,314 = [2 * (3,094,840 + 11,599,743 + 491,574) + 1 * (20,000)]\}$

<sup>36</sup> NHTSA estimates there are total of 15,206,157 vehicles requiring air bag labels annually. This total includes 3,094,840 passenger cars; 11,599,743 light truck vehicles, 491,574 medium and heavy trucks; and 20,000 medium and heavy buses.

manufacturers. The total cost for these labels is \$7,895,036.71 (15,206,157\* 1.1 spare parts factor \* \$0.472 per label). This cost also reflects the manufacturer's allocation of capital expenditures and equipment depreciation to the cost of each part.

| <b>Manufacturing Burden Cost from FMVSS No. 208 Labeling Requirements</b>   |                 |
|-----------------------------------------------------------------------------|-----------------|
| <i>(1) Annual Burden to Produce Sun Visor Air Bag Warning Labels</i>        |                 |
| Approximate number of air bag warning labels                                | 30,392,314      |
| 10% spare parts factor                                                      | 1.1             |
| Cost per applied label                                                      | \$0.2280        |
| <b><i>Annual manufacturing cost burden for sun visor labels</i></b>         | <b><i>0</i></b> |
| <i>(2) Annual Burden to Produce Dashboard Air Bag Warning Labels</i>        |                 |
| Approximate number of steering wheel or dashboard labels                    | 15,206,157      |
| 10% spare parts factor                                                      | 1.1             |
| Cost per applied label                                                      | \$0.472         |
| <b><i>Annual Manufacturing cost burden for dashboard warning labels</i></b> | <b><i>0</i></b> |
| <b>Total annual manufacturing cost – air bag warning labels</b>             | <b>0</b>        |

#### FMVSS No. 209, “Seat belt assemblies”

##### *Annual costs to produce seat belt assembly labels*

For the purposes of this analysis, it will be necessary to estimate the total number of seat belt assemblies which are sold for the US vehicle market on an annual basis by manufacturers. A point estimate of 100,510,374 seat belt assemblies<sup>37</sup> per year is used to estimate annualized costs. It is further estimated that an additional 10% of the seat belt assemblies are produced as spare parts. NHTSA estimates manufacturers have a \$0.0423 cost burden per label applied to each seat belt assembly. The total annual cost to make and apply labels to the seat belt assemblies is \$4,676,747.70 (100,510,374 \* 1.1 \* \$0.04230).

<sup>37</sup> It is estimated that there are 3,094,840 passenger cars each with 5 unique seat belt assemblies; 11,599,743 light truck vehicles each with 7 unique seat belt assemblies; 491,574 medium/heavy truck vehicles each with 5 glazing units, 20,000 medium and heavy bus vehicles each with 3 unique seat belt assemblies; 464,757 campers each with 2 unique seat belt assemblies; and 50,000 universal seat belt assemblies (not specific to a vehicle). The total estimated number of seat belt assemblies is 100,510,374 [(3,094,840 \* 5) + (11,599,743 \* 7) + (491,574 \* 5) + (20,000 \* 3) + (464,757 \* 2) + (50,000)].

This cost also reflects the manufacturer's allocation of capital expenditures and equipment depreciation to the cost of each part.

| <b>Manufacturing Cost Burden from FMVSS No. 209 Labeling Requirements</b> |             |
|---------------------------------------------------------------------------|-------------|
| <i>(1) Annual Production Cost for Seat Belt Labels</i>                    |             |
| Annual Number of seat belt labels                                         | 100,510,374 |
| 10% spare parts factor                                                    | 1.1         |
| Cost per label application                                                | \$0.04230   |
| <b><i>Annual manufacturing burden cost for label application</i></b>      | <b>0</b>    |

FMVSS No. 303, “Fuel system integrity of compressed natural gas vehicles.”

*Annual costs to produce CNG vehicle labels*

For the purposes of this analysis, it will be necessary to estimate the total number of CNG vehicles which are sold for the US vehicle market on an annual basis by manufacturers. A point estimate of 10,000 CNG vehicles per year is used to estimate annualized costs. NHTSA estimates manufacturers create and apply labels to CNG vehicles at a cost of \$0.7300 per label. The total annual cost to make and apply labels to the CNG vehicles is \$7,300.00 (10,000 \* \$0.7300). This cost also reflects the manufacturer's allocation of capital expenditures and equipment depreciation to the cost of each part.

| <b>Manufacturing Cost Burden from FMVSS No. 303 Labeling Requirements</b> |                |
|---------------------------------------------------------------------------|----------------|
| <i>Annual Production of CNG Vehicle Labels</i>                            |                |
| Annual Number of CNG vehicle labels                                       | 10,000         |
| No spare parts factor                                                     | 1.0            |
| Cost label application                                                    | \$0.7300       |
| <b><i>Annual manufacturing burden cost for label application</i></b>      | <b>\$7,300</b> |

FMVSS No. 304, “Compressed natural gas fuel container integrity.”

*Annual costs to produce CNG vehicle labels*

For the purposes of this analysis, it will be necessary to estimate the total number of CNG container units which are sold for the US vehicle market on an annual basis by manufacturers. A point estimate of 40,000 CNG containers per year is used to estimate annualized costs. NHTSA estimates each applied label costs manufacturers \$0.7300 to apply the label to a container. The total annual cost to make and apply labels to the CNG containers is \$29,206.35 (40,000 \* \$0.050). This cost also reflects the manufacturer's allocation of capital expenditures and equipment depreciation to the cost of each part.

| <b>Manufacturing Cost Burden from FMVSS No. 304 Labeling Requirements</b> |                 |
|---------------------------------------------------------------------------|-----------------|
| <i>Annual Application costs for CNG Containers</i>                        |                 |
| Annual Number of CNG vehicle labels                                       | 40,000          |
| No spare parts factor                                                     | 1.0             |
| Cost label application                                                    | \$0.7300        |
| <b><i>Annual manufacturing burden cost for label application</i></b>      | <b>\$29,206</b> |

FMVSS No. 307, “Fuel system integrity of hydrogen vehicles.”

*Annual costs to produce hydrogen vehicle labels*

For the purposes of this analysis, it will be necessary to estimate the total number of hydrogen vehicles which are sold for the US vehicle market on an annual basis by manufacturers. A point estimate of 3,239 hydrogen vehicles<sup>38</sup> per year is used to estimate annualized costs. NHTSA estimates manufacturers create and apply labels to hydrogen vehicles at a cost of \$0.7300 per label. The total annual cost to make and apply labels to the hydrogen vehicles is \$2,364.47 (3,239 \* \$0.7300). This cost also reflects the manufacturer's allocation of capital expenditures and equipment depreciation to the cost of each part.

| <b>Manufacturing Cost Burden from FMVSS No. 307 Labeling Requirements</b> |       |
|---------------------------------------------------------------------------|-------|
| <i>Annual Production of Hydrogen Vehicle Labels</i>                       |       |
| Annual Number of hydrogen vehicle labels                                  | 3,239 |

<sup>38</sup> It is estimated that there are 2,978 passenger car FCEVs, 0 light truck FCEVs, 100 medium/heavy truck FCEVs, 161 transit bus FCEVs, and 00 RV FCEVs. The total estimated number of hydrogen FCEVs produced annually is 3,239 vehicles.

|                                                                      |                |
|----------------------------------------------------------------------|----------------|
| No spare parts factor                                                | 1.0            |
| Cost label application                                               | \$0.7300       |
| <b><i>Annual manufacturing burden cost for label application</i></b> | <b>\$2,364</b> |

FMVSS No. 308, “Compressed hydrogen storage system integrity.”

*Annual costs to produce hydrogen vehicle labels*

For the purposes of this analysis, it will be necessary to estimate the total number of hydrogen container units which are sold for the US vehicle market on an annual basis by manufacturers. A point estimate of 10,500 hydrogen containers<sup>39</sup> per year is used to estimate annualized costs. NHTSA estimates each applied label costs manufacturers \$0.73. The total annual cost to make and apply labels to the hydrogen containers is \$7,655.00 (10,500 \* 1.0 \* \$0.73). This cost also reflects the manufacturer's allocation of capital expenditures and equipment depreciation to the cost of each part.

| <b>Manufacturing Cost Burden from FMVSS No. 308 Labeling Requirements</b> |          |
|---------------------------------------------------------------------------|----------|
| <i>Annual Application costs for hydrogen Containers</i>                   |          |
| Annual Number of hydrogen vehicle labels                                  | 10,500   |
| No spare parts factor                                                     | 1.0      |
| Cost label application                                                    | \$0.730  |
| <b><i>Annual manufacturing burden cost for label application</i></b>      | <b>0</b> |

Item 13 Summary estimate of total annualized cost to respondents or recordkeepers

| <b>FMVSS No.</b> | <b>Brief Title</b>                   | <b>Total Yearly Cost</b> |
|------------------|--------------------------------------|--------------------------|
| 105              | Hydraulic and electric brake systems | \$26,211                 |
| 135              | Light vehicle brake systems          | \$297,257                |

<sup>39</sup> An estimated 3 labels are required for each of the 2,978 hydrogen powered passenger cars, 6 labels for each of the 100 hydrogen powered medium/heavy trucks, and 6 labels for each of the 161 hydrogen powered transit buses. One label will be at the fueling port of each vehicle and the remaining labels will each be on the vehicles' hydrogen storage containers, one label per container.

-

|              |                           |              |
|--------------|---------------------------|--------------|
| 205          | Glazing Material          | \$3,044,041  |
| 208          | Occupant Crash Protection | \$15,517,429 |
| 209          | Seat Belt Assemblies      | \$4,676,748  |
| 303          | CNG Vehicles              | \$7,300      |
| 304          | CNG Fuel Containers       | \$29,206     |
| 307          | Hydrogen Vehicles         | \$2,364      |
| 308          | Hydrogen Storage System   | \$7,665      |
| <b>Total</b> |                           | <b>0</b>     |

**14. Provide estimates of annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.**

FMVSS No. 105, “Hydraulic and electric brake systems”

There is no historical annualized cost to the Federal government as the manufacturers certify that the labels meet the requirements for this regulation. There is no exchange of correspondence, tabulation of data, or response necessary.

FMVSS No. 135, “Light vehicle brake systems”

NHTSA performs 7 tests on average each year to evaluate brake systems and estimates 0.25 labor hours are necessary to collect and record the information relevant to this standard for each test. For test information gathering, NHTSA uses the \$32.69 mean hourly wage for “Mechanical Engineering Technologists and Technicians” (occupational code 17-3027) to estimate this burden costs<sup>40</sup>. BLS estimates that hourly wages represent approximately 70.3% of total compensation for private industry workers<sup>41</sup> for a total hourly wage estimate of \$46.50.

The estimated yearly burden for the Federal government to verify this label information is \$81.38 (7 tests \* 0.25 hours per test \* \$46.50 per hour).

|                                                                          |              |
|--------------------------------------------------------------------------|--------------|
| Estimated annual number of tests NHTSA performs annually                 | 7            |
| Approximate estimated for time spent collecting information during tests | 0.25         |
| Estimated labor hours cost, based on \$30.47 per labor hour rate         | \$46.50      |
| <b>Estimated total annualized costs to Federal Government</b>            | <b>81.38</b> |

FMVSS No. 205, “Glazing materials”

**1. Request for Identification Number**

The cost to the Federal Government associated with assigning the DOT code numbers is absorbed by the Office of Vehicle Safety Compliance staff members along with their other duties. Collecting, telephoning, processing, and analyzing the letters is not a significant burden for the staff. We estimate the staff need 4 hours for each of the 22 average annual requests for a DOT code number. NHTSA uses a Federal hourly wage of \$53.45<sup>42</sup> to estimate support for these requests. Further, BLS estimates that hourly wages represent

<sup>40</sup> U.S. Bureau of Labor Statistics, Occupational Employment and Wages, May 2023; 17-3027 Mechanical Engineering Technologists and Technicians <https://www.bls.gov/oes/current/oes173027.htm>, accessed February 12, 2025.

<sup>41</sup> U.S. Bureau of Labor Statistics, Employer Costs for Employee Compensation – June 2024, accessed February 12, 2025. (<https://www.bls.gov/news.release/pdf/ecec.pdf>)

approximately 70.3% of total compensation<sup>43</sup>. The resulting per hourly labor cost is \$76.03 (\$53.45/70.3%). Based on an hourly labor cost of \$76.03, it is estimated to cost the Federal Government \$6,691 annually to process the DOT code number requests (\$76.03/hour \* 4 hours/request \* 22 requests = \$6,691). This includes record keeping, maintenance of logbooks, mail services, and maintenance of a computerized data base of all glazing manufacturers.

## 2. Labeling for Glazing Materials

For the Federal government, there are virtually no annual costs discernible in support of the labeling requirements, other than the maintenance of contact with persons outside the agency to obtain views on the labeling requirements. The corresponding annualized cost estimated are developed below.

For the HOTLINE supporting labor hours, NHTSA uses a Federal hourly wage of \$53.45<sup>44</sup>. BLS estimates that hourly wages represent approximately 70.3% of total compensation<sup>45</sup>. Therefore, NHTSA estimates the total hourly labor cost associated with HOTLINE support to be \$76.03 (\$53.45/0.703) per hour.

### Pro rata share of HOTLINE discussion dealing with requirements for automotive glazing labeling:

|                                                                                                                                                                                                                                                                                     |         |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------|
| Estimated annual number of HOTLINE calls dealing with labeling                                                                                                                                                                                                                      | 12      |
| Approximate estimated duration of call (hours)                                                                                                                                                                                                                                      | 0.1     |
| Approximate additional administrative or technical time per call (hours)                                                                                                                                                                                                            | 0.5     |
| Total estimated labor hours to complete each call (sum of the above two)                                                                                                                                                                                                            | 0.6     |
| Estimated labor hours, HOTLINE support                                                                                                                                                                                                                                              | 7.2     |
| Estimated labor hours cost, based on \$53.45 per labor hour rate                                                                                                                                                                                                                    | \$76.03 |
| Estimated total annualized costs to Federal Government (glazing labeling)<br>(Note: Costs of preparation of material and publishing lists of current DOT code number assignments in Federal Register not included because these costs are accrued in accordance with OMB 2127-0038. | 0       |

## FMVSS No. 208, "Occupant Crash Protection"

NHTSA performs 12 tests on average each year to evaluate occupant protection during frontal crashes and estimates 0.25 labor hours are necessary to collect and record the

<sup>42</sup> A General Schedule employee at the grade 12 level, step 4, earns \$53.45 per hour working in the Locality Pay Area of Washington-Baltimore-Arlington.

<sup>43</sup> U.S. Bureau of Labor Statistics, Employer Costs for Employee Compensation – June 2024, accessed February 12, 2025. (<https://www.bls.gov/news.release/pdf/ecec.pdf>)

<sup>44</sup> A General Schedule employee at the grade 12 level, step 4, earns \$53.45 per hour working in the Locality Pay Area of Washington-Baltimore-Arlington.

<sup>45</sup> U.S. Bureau of Labor Statistics, Employer Costs for Employee Compensation – June 2024, accessed February 12, 2025. (<https://www.bls.gov/news.release/pdf/ecec.pdf>)

information label relevant to this standard for each test. For test information gathering, NHTSA uses the \$32.69 mean hourly wage for “Mechanical Engineering Technologists and Technicians” (occupational code 17-3027) to estimate this burden costs<sup>46</sup>. BLS estimates that hourly wages represent approximately 70.3% of total compensation for private industry workers<sup>47</sup>. Total wage estimate for this type of employee is \$46.50.

The estimated yearly burden for the Federal government to verify this label information is \$139.5 (12 tests \* 0.25 hours per test \* \$(30.47/0.703) per hour).

|                                                                          |              |
|--------------------------------------------------------------------------|--------------|
| Estimated annual number of tests NHTSA performs annually                 | 12           |
| Approximate estimated for time spent collecting information during tests | 0.25         |
| Estimated hourly labor rate, based on \$30.47 per labor hour rate        | \$46.50      |
| <b>Estimated total annualized costs to Federal Government</b>            | <b>139.5</b> |

#### FMVSS No. 209, “Seat belt assemblies”

NHTSA performs 18 tests on average each year to evaluate seat belt assemblies and estimates 0.25 labor hours are necessary to collect and record the information relevant to this standard for each test. For test information gathering, NHTSA uses the \$32.69 mean hourly wage for “Mechanical Engineering Technologists and Technicians” (occupational code 17-3027) to estimate this burden costs<sup>48</sup>. BLS estimates that hourly wages represent approximately 70.3% of total compensation for private industry workers<sup>49</sup>. Total wage estimate for this type of employee is \$46.50.

The estimated yearly burden for the Federal government to verify this label information is \$209.25 (18 tests \* 0.25 hours per test \* \$(32.69/0.703) per hour).

|                                                                          |               |
|--------------------------------------------------------------------------|---------------|
| Estimated annual number of tests NHTSA performs annually                 | 18            |
| Approximate estimated for time spent collecting information during tests | 0.25          |
| Estimated labor hours cost, based on \$30.47 per labor hour rate         | \$46.50       |
| <b>Estimated total annualized costs to Federal Government</b>            | <b>209.25</b> |

<sup>46</sup> U.S. Bureau of Labor Statistics, Occupational Employment and Wages, May 2023; 17-3027 Mechanical Engineering Technologists and Technicians <https://www.bls.gov/oes/current/oes173027.htm>, accessed February 12, 2025.

<sup>47</sup> U.S. Bureau of Labor Statistics, Employer Costs for Employee Compensation – December 2020, accessed June 01, 2021. (<https://www.bls.gov/news.release/pdf/eccec.pdf>)

<sup>48</sup> U.S. Bureau of Labor Statistics, Occupational Employment and Wages, May 2023; 17-3027 Mechanical Engineering Technologists and Technicians <https://www.bls.gov/oes/current/oes173027.htm>, accessed February 12, 2025.

<sup>49</sup> U.S. Bureau of Labor Statistics, Employer Costs for Employee Compensation – December 2020, accessed June 01, 2021. (<https://www.bls.gov/news.release/pdf/eccec.pdf>)

FMVSS No. 303, “Fuel system integrity of compressed natural gas vehicles.”

There is no historical annualized cost to the Federal government as the manufacturers certify that the labels meet the requirements for this regulation. There is no exchange of correspondence, tabulation of data, or response necessary.

FMVSS No. 304, “Compressed natural gas fuel container integrity.”

NHTSA performs 12 tests on average each year to evaluate compressed natural gas fuel containers and estimates 0.25 labor hours are necessary to collect and record the information relevant to this standard for each test. For test information gathering, NHTSA uses the \$32.69 mean hourly wage for “Mechanical Engineering Technologists and Technicians” (occupational code 17-3027) to estimate this burden costs<sup>50</sup>. BLS estimates that hourly wages represent approximately 70.3% of total compensation for private industry workers<sup>51</sup>. Total wage estimate for this type of employee is \$46.50.

The estimated yearly burden for the Federal government to verify this label information is \$88.41 (12 tests \* 0.25 hours per test \* \$46.50 per hour).

|                                                                          |              |
|--------------------------------------------------------------------------|--------------|
| Estimated annual number of tests NHTSA performs annually                 | 12           |
| Approximate estimated for time spent collecting information during tests | 0.25         |
| Estimated labor hours cost, based on \$32.69 per labor hour rate         | \$46.50      |
| <b>Estimated total annualized costs to Federal Government</b>            | <b>139.5</b> |

FMVSS No. 307, “Fuel system integrity of hydrogen vehicles.”

There is no historical annualized cost to the Federal government as the manufacturers certify that the labels meet the requirements for this regulation. There is no exchange of correspondence, tabulation of data, or response necessary.

FMVSS No. 308, “Compressed hydrogen storage system integrity.”

There is no historical annualized cost to the Federal government as the manufacturers certify that the labels meet the requirements for this regulation. There is no exchange of correspondence, tabulation of data, or response necessary.

Summary estimate of annualized cost to the Federal government

| FMVSS No. | Cost |
|-----------|------|
| 105       | \$0  |

<sup>50</sup> U.S. Bureau of Labor Statistics, Occupational Employment and Wages, May 2023; 17-3027 Mechanical Engineering Technologists and Technicians <https://www.bls.gov/oes/current/oes173027.htm>, accessed February 12, 2025.

<sup>51</sup> U.S. Bureau of Labor Statistics, Employer Costs for Employee Compensation – December 2020, accessed June 01, 2021. (<https://www.bls.gov/news.release/pdf/eccec.pdf>)

|              |          |
|--------------|----------|
| 135          | \$81     |
| 205          | \$7,238  |
| 208          | \$140    |
| 209          | \$209    |
| 303          | \$0.     |
| 304          | \$140    |
| 307          | \$0.     |
| 308          | \$0.     |
| <b>Total</b> | <b>0</b> |

**15. Explain the reasons for any program changes or adjustments reported on the burden worksheet. If this is a new collection, the program change will be the number of burden hours reported in response to question 12 and the entire burden cost reported in response to question 13. If this is a renewal or reinstatement, the change is the difference between the new burden estimates and the burden estimates from the last OMB approval.**

This is a reinstatement with modification of a previously approved information collection. The adjustment in the burden is due to the addition of labeling requirements from FMVSS Nos. 208, 303, 304, 307, and 308 and other adjustments to reflect more current wages and production information. Also, this revision of a previously approved information collection now accounts for the cost burden associated with the part costs due to the labeling requirements of FMVSS Nos. 105, 135, 205, 208, 209, 303, 304, 307, and 308. These adjustments increased the burden hours from 7,874 to 35,126 hours and the cost burden from \$157,480 to \$25,124,523.

**16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions as applicable.**

The agency has no plans to publish the labeling required by FMVSS Nos. 105, 135, 205, 208, 209, 303, 304, 307, and 308.

**17. If seeking approval to not display the expiration date for OMB approval of the information, collection, explain the reasons that display would be inappropriate.**

The agency is seeking approval to not display the expiration date for OMB approval. These information collections are entirely contained within FMVSSs and, therefore, rulemaking would be required to update the expiration date.

**18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions." The required certifications can be found at 5 CFR 1320.9.**

There are no exceptions to the certification statement.

**B. COLLECTION OF LABELING FOR STATISTICAL METHODS**

The labeling requirements of Parts 571.105, 135, 205, 208, 209, 303, 304, 307, and 308 do not employ any statistical methods, and therefore, are exempt from applying the criteria of Section B within this Supporting Statement.